

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

CHILD TRENDS, INCORPORATED et al.,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
EDUCATION et al.,

Defendants.

Case No. 8:25-cv-01154-BAH

**DECLARATION OF DANIEL F. JACOBSON IN SUPPORT OF PLAINTIFFS'
PETITION FOR ATTORNEYS' FEES**

I, Daniel F. Jacobson, declare as follows:

1. I am the Founding Partner of Jacobson Lawyers Group PLLC and counsel of record for Plaintiffs in this matter. I make this declaration based on my personal knowledge.

2. Jacobson Lawyers Group is a boutique law firm consisting primarily of former government attorneys, focused in large part on government-facing litigation. A large percentage of our litigation to date has focused in particular on issues related to federal funding, grants, and contracts. Jacobson Lawyers Group represents clients, including small businesses, nonprofits, unions, individuals, and local government entities injured by the federal government's actions, including with respect to the deprivation of funding. The firm's office is located at 5100 Wisconsin Ave. NW, Suite 301, Washington, DC 20016.

3. I served as lead counsel on this matter, along with Lynn Eisenberg, another Partner at Jacobson Lawyers Group. Kyla Snow, Counsel for Jacobson Lawyers Group, also significantly contributed to the case as a member of the litigation team.

4. I have been in good standing and licensed to practice law since 2012. I graduated from Harvard Law School, *magna cum laude*, and in 2011, and thereafter completed two federal clerkships, for the Honorable A. Wallace Tashima on the Ninth Circuit Court of Appeals and the Honorable Naomi Reice Buchwald in the Southern District of New York. I am a member of the bars of the District of Columbia and New York. I am also admitted to the bar of numerous federal courts, including the U.S. District Courts for Maryland, the District of Columbia, and the Southern District of New York, the U.S. Court of Federal Claims, the U.S. Courts of Appeals for the First, Second, Third, Fourth, District of Columbia, and Federal Circuits, and the Supreme Court of the United States. Prior to founding the firm, I served in several roles in the federal government, including as General Counsel of the Office of Management and Budget from 2022 until 2025, where I was a lead attorney for the Executive Branch on issues involving federal appropriations, funding, grants, and administrative law. In private practice, I was a litigator for more than five years at Arnold & Porter in Washington, D.C.

5. I founded Jacobson Lawyers Group in February of this year, in part to address an emergent need for lawyers with knowledge and experience in federal funding to provide representation to those impacted by the federal government's unprecedented funding actions.

6. I founded the firm with a specific goal to make our services accessible to nonprofits and small businesses with limited resources, and our firm has stayed true to that goal in charging rates that are a small fraction of the rates charged by major law firms, including in this case. Being able to charge these reduced rates has proven especially important given the substantial drop in large law firms that are willing to provide pro bono representation to entities suing the federal government.¹

¹ See, e.g., Mike Spector et al., *How Trump's crackdown on law firms is undermining legal defenses for the vulnerable*, Reuters,

7. The firm has been sought out for our unique knowledge of appropriations and grant law, combined with the experience of the firm's attorneys in litigating actions involving the federal government. The firm has been retained by a number of clients impacted by actions at the Department of Education in particular, given Ms. Eisenberg's experience as a former senior attorney at the Department.

8. Since our founding roughly nine months ago, the firm has filed ten lawsuits and has achieved full or partial success in nine of those ten suits. Eight of these nine cases have had some connection to federal spending, and several relate to an agency's refusal to spend congressionally mandated appropriations, as in the instant case. A full listing of the cases in which the firm has achieved success can be found at <https://www.jacobsonlawyersgroup.com/litigation>.

9. In addition to the litigation we have brought, our firm has filed three amicus briefs, one in the Supreme Court and two at the courts of appeals. *See Solutions in Hometown Connections v. Noem*, No. 25-1640, Dkt. 26 (4th Cir.); *Climate United Fund v. Citibank, N.A.*, No. 25-5122, Dkt. 1208739297 (D.C. Cir.); *U.S. Dep't of Educ. v. California*, No. 24A910, Amicus Brief of National Center for Learning Disabilities (Mar. 29, 2025). All three related to federal funding and/or the Tucker Act.

10. Additionally, I have published several articles on issues related to appropriations law, including the impoundment of funds and the Tucker Act, and been quoted by several news outlets reporting on these issues. *See* <https://www.jacobsonlawyersgroup.com/in-the-news>.

11. Ms. Eisenberg has been in good standing and licensed to practice law since 2013, after earning her J.D. from New York University School of Law with honors in 2012. Ms.

<https://www.reuters.com/investigations/trumps-war-big-law-leads-firms-retreat-pro-bono-work-undersdogs-2025-07-31/>.

Eisenberg is a member of the bars of New York, the District of Columbia, the U.S. District Court for the District of Columbia, and the U.S. District Court for the District of Maryland. She has worked with Jacobson Lawyers Group since its founding in February 2025 and became a Partner in July 2025.

12. Before joining Jacobson Lawyers Group, from June 2022 until September 2024, Ms. Eisenberg served as Principal Deputy General Counsel at the U.S. Department of Education, where she assisted in managing a broad range of legal issues for the Department, including overseeing attorneys charged with legal issues relating to grants and contracts. From January 2021 until June 2022, she served as General Counsel at the U.S. Office of Personnel Management and previously served as Associate White House Counsel and Deputy Associate White House Counsel from December 2014 until January 2017. She has also spent approximately five years in private practice at WilmerHale in Washington, D.C.

13. Ms. Eisenberg has a deep understanding of the Department of Education and substantial experience litigating matters of administrative law generally and federal funding in particular. At Jacobson Lawyers Group specifically, she has represented plaintiffs in the following cases involving federal funding: *Anchorage School Dist., et al. v. Dep't of Education, et al.*, Civ. No. 25-347 (D.R.I. Aug. 25, 2025); *Am. Council of Learned Societies v. McDonald*, No. 25 CIV. 3657 (S.D.N.Y.); *Rhode Island Coal. Against Domestic Violence v. Bondi*, 2025 WL 2271867 (D.R.I.); *Rhode Island Coal. Against Domestic Violence v. Kennedy*, 1:25-cv-00342-MRD-PAS (D.R.I.).

14. Ms. Snow has been in good standing and licensed to practice law since 2017. She earned her J.D. from The Ohio State University Moritz College of Law, where she graduated at the top of her class. She also completed two federal clerkships, in the U.S. District Court for the

Southern District of Ohio and the U.S. Court of Appeals for the Sixth Circuit. She is a member of the bars of the District of Columbia and Ohio, the U.S. District Courts for the Southern District of Ohio and the Western District of Tennessee, the U.S. Courts of Appeals for the Sixth Circuit and the District of Columbia, and the Supreme Court of the United States. She was Jacobson Lawyers Group's first employee, having served as Counsel at the firm since March 2025.

15. Ms. Snow has extensive knowledge and experience in litigation against the federal government, including in matters arising under the Administrative Procedure Act or the Constitution, and in matters involving federal funding specifically. Before joining Jacobson Lawyers Group, Ms. Snow spent more than five years as a trial attorney in the Civil Division of the U.S. Department of Justice, where she defended challenges to the federal government actions, policies, and decisions in courts across the country. In that role, she earned several Civil Division-wide awards for her work. While at the Department of Justice, she also completed a six-month attorney detail at the General Counsel's Office in the Office of Management and Budget, where she reviewed draft rules from agencies across the federal government and advised on Administrative Procedure Act and other legal issues. As to federal funding in particular, while serving as a trial attorney at DOJ, Ms. Snow was lead counsel in a challenge to a potential lapse in funding for Supplemental Nutrition Assistance Program (SNAP) benefits. *See Erdmann-Browning v. Vilsack*, No. 4:23-cv-4678 (N.D. Cal.).

16. At Jacobson Lawyers Group, under the supervision of Mr. Jacobson and Ms. Eisenberg, Ms. Snow has significantly assisted in the representation of plaintiffs in the following cases, all of which have been successful: *Anchorage School Dist. v. Dep't of Education, et al.*, Civ. No. 25-347 (D.R.I.); *Protect Democracy Project v. Office of Management & Budget*, Civ.

No. 25-cv-1111 (D.D.C.), *appeal docketed*, No. 25-5267 (D.C. Cir.); *Rhode Island Coal. Against Domestic Violence v. Bondi*, 2025 WL 2271867 (D.R.I.); and *Jones v. Dep't of Labor*, No. 1:25-cv-12653 (D. Mass). She has also assisted with drafting amicus briefs in *Solutions in Hometown Connections v. Noem*, No. 25-1640, Dkt. 26 (4th Cir.), and *Climate United Fund v. Citibank, N.A.*, No. 25-5122, Dkt. 1208739297 (D.C. Cir.).

17. Attached to this declaration as Exhibit A are billing records that reflect the total amount of attorneys' fees Jacobson Lawyers Group is seeking to recover: \$200,612 (plus future amounts billed for litigation over the fee petition). Exhibit A was prepared from records that were made contemporaneously with the provision of services billed, and it is true and correct to the best of my knowledge.

18. The prevailing market rates for the kind and quality of the services furnished by the attorneys in this matter exceed the statutory maximum of \$125 per hour, adjusted for cost of living. *See* 28 U.S.C. § 2412(d)(2)(A). The statutory rate adjusted for cost of living, based on the Consumer Price Index – Urban (CPI-U) for Baltimore-Columbia-Townson, MD, https://www.bls.gov/regions/mid-atlantic/news-release/consumerpriceindex_baltimore.htm, is \$262.

19. As discussed in the Petition for Attorneys' Fees, counsel have distinctive knowledge and specialized skills in the areas of federal appropriations, grants law, and Department of Education programs, all of which warrant a further upward adjustment of the hourly rate. *See Pierce v. Underwood*, 487 U.S. 552, 572 (1988). As explained above, each attorney on this matter has litigated many federal funding matters while at Jacobson Lawyers Group, achieving significant success in most of those cases. Counsel developed expertise necessary to successfully litigate these cases through positions preceding their present roles at

Jacobson Lawyers Group. Together, counsel possess a “combined knowledge of” appropriations, federal grants and contracts, the Administrative Procedure Act, and the Department of Education that few if any other law firms possess. *See Int’l Woodworkers, Local 3-98 v. Donovan*, 792 F.2d 762, 766 (9th Cir. 1985).

20. Counsels’ distinctive knowledge and specialized skills warrant an upward adjustment to \$400 per hour for Mr. Jacobson and Ms. Eisenberg, and \$350 per hour for Ms. Snow. These rates are less than or equal to the rates charged for each attorney’s time in this matter.

21. These rates are comparable to the presumptively reasonable rates contained in the Guidelines Regarding Hourly Rates at Appendix B of the District of Maryland’s Local Rules. The Appendix lists a range of \$225–350 for lawyers admitted to the bar for 9 to 14 years, and a range of \$165–300 for lawyers admitted to the bar for 5 to 8 years. The Local Rules state that “[t]he Court recognizes that there are attorneys for whom, and cases for which, the market rate differs from these guidelines rates.” D.Md. L.R., Appendix B, p.122, at *. At the time the litigation began, Mr. Jacobson and Ms. Eisenberg had been licensed to practice law for roughly 13 and 12 years, respectively, and Ms. Snow had been licensed to practice law for 8 years.

22. The rates requested are also much lower than those set for the United States Attorney’s Office based on their Fees Matrix for the years 2024–2025, a copy of which can be found at <http://www.laffeymatrix.com/see.html>. “[T]he rates produced by the USAO Laffey Matrix are frequently awarded to attorneys engaged in complex federal litigation” in the District of Columbia, *Heller v. District of Columbia*, 832 F. Supp. 2d 32, 48 (D.D.C. 2011), where much of the litigation challenging federal government actions is filed. Under that Matrix, counsel would be entitled to more than double the rate they are seeking compensation for here.

23. Given my experience as General Counsel of OMB, there are very few practicing litigators that possess my knowledge of appropriations law. That experience was central to the successful prosecution of this case, as was Ms. Eisenberg's knowledge of and experience at the Department of Education. Ms. Snow brought the knowledge of myself and Ms. Snow to bear in litigation this action under our direction, and Ms. Snow further brought her own years of experience litigating administrative law and constitutional actions at the Department of Justice.

24. It is highly unlikely that any firm of comparable skill and experience, in this geographic area, would have undertaken this litigation at the statutory rate for \$125, adjusted for inflation. It is nearly as unlikely that any comparable firm would have brought this action for the reduced rates of \$400 and \$350 per hour that Plaintiffs seek in this petition.

25. Finally, it is important for non-profits and small businesses such as Plaintiffs to recover attorneys' fees when retaining counsel to litigation against the federal government, especially given the substantial drop in firms providing pro bono representation in such cases. Awarding the fees that Plaintiffs request would serve a substantial public purpose.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 12th day of November, 2025.

/s/ Daniel F. Jacobson
Daniel F. Jacobson

EXHIBIT A

Billing Records

Date	Litigation Phase	Lawyer	Description	Hours
4/1/2025	Pleadings	Daniel Jacobson	Draft complaint; review background documents.	3.81
4/2/2025	Pleadings	Daniel Jacobson	Draft complaint.	4.9
4/3/2025	Pleadings + Case development	Daniel Jacobson	Draft and revise complaint; have phone calls with potential local counsel; review litigation hold notice.	5.53
4/4/2025	Pleadings	Daniel Jacobson	Revise complaint; research case law.	5.7
4/5/2025	Pleadings + Case development	Daniel Jacobson	Revise complaint; join calls with counsel about Tucker Act and causes of action; research case law.	8.06
4/6/2025	Pleadings + Case development	Daniel Jacobson	Revise complaint; attend calls with clients to discuss case strategy following the Court's decision in Department of Education v. California.	4.2
4/7/2025	Pleadings	Daniel Jacobson	Revise complaint.	3.87
4/8/2025	Motions practice	Daniel Jacobson	Draft preliminary injunction motion.	1.32

4/9/2025	Motions practice	Daniel Jacobson	Revise preliminary injunction motion.	3.17
4/10/2025	Motions practice	Daniel Jacobson	Draft preliminary injunction brief.	4.29
4/11/2025	Motions practice	Daniel Jacobson	Revise preliminary injunction brief.	1.29
4/13/2025	Motions practice	Daniel Jacobson	Revise preliminary injunction brief.	0.85
4/14/2025	Motions practice	Daniel Jacobson	Revise preliminary injunction motion and proposed order.	4.37
4/15/2025	Motions practice	Daniel Jacobson	Revise and file preliminary injunction motion.	2.41
4/23/2025	Motions practice	Daniel Jacobson	Review government opposition brief; have call with L. Eisenberg and K. Snow to discuss reply brief.	1.24
4/24/2025	Motions practice	Daniel Jacobson	Participate in call with clients about reply brief.	0.49
4/25/2025	Motions practice	Daniel Jacobson	Draft reply brief.	1.25
4/26/2025	Motions practice	Daniel Jacobson	Draft reply brief.	8.91
4/27/2025	Motions practice	Daniel Jacobson	Revise reply brief.	4.71

5/7/2025	Motions practice	Daniel Jacobson	Review and discuss with K. Snow court order on potential stay.	0.26
5/8/2025	Motions practice	Daniel Jacobson	Draft response to order on possible stay.	3.05
5/9/2025	Motions practice	Daniel Jacobson	Draft response to letter order on stay.	3.1
5/11/2025	Motions practice	Daniel Jacobson	Revise response to stay order.	3.8
5/12/2025	Motions practice	Daniel Jacobson	Revise response to letter order on stay.	1.25
5/14/2025	Motions practice	Daniel Jacobson	Draft response to notice of related case.	0.91
5/14/2025	court hearings	Daniel Jacobson	Prepare for hearing.	6
5/15/2025	Motions practice	Daniel Jacobson	Revise response to related case notice.	0.27
5/17/2025	court hearings	Daniel Jacobson	Prepare for hearing.	5.3
5/18/2025	court hearings	Daniel Jacobson	Prepare for oral argument.	6.28
5/19/2025	court hearings	Daniel Jacobson	Prepare for hearing.	3.63
5/20/2025	court hearings	Daniel Jacobson	Prepare for and participate in hearing.	6
5/21/2025	Motions practice	Daniel Jacobson	Draft proposed order. Attend call with clients on proposed order.	1.34

6/2/2025	Motions practice	Daniel Jacobson	Review DOJ notice of supplemental authority; discuss internally with team.	0.5
6/3/2025	motions practice	Daniel Jacobson	Draft response to notice of supplemental authority.	2.06
6/4/2025	motions practice	Daniel Jacobson	Revise response to Defendants' notice of supplemental authority.	0.72
6/6/2025	motions practice	Daniel Jacobson	Draft response to supplemental authority.	4.35
6/11/2025	case development	Daniel Jacobson	Review PI opinion; confer on next steps.	1.37
6/23/2025	motions practice	Daniel Jacobson	Review administrative record.	0.33
6/24/2025	motions practice	Daniel Jacobson	Review administrative record.	0.49
6/27/2025	case development	Daniel Jacobson	Correspond with clients on Supreme Court decision.	0.11
6/29/2025	case development	Daniel Jacobson	Confer with clients regarding potential amended complaint.	0.8
7/8/2025	motions practice	Daniel Jacobson	Draft summary judgment brief.	5.73
7/9/2025	motions practice	Daniel Jacobson	Draft summary judgment filings; review government's brief.	7.77
7/10/2025	motions practice	Daniel Jacobson	Research case law	1.8

7/10/2025	motions practice	Daniel Jacobson	participate in internal team call to discuss response brief	0.64
7/12/2025	motions practice	Daniel Jacobson	Draft response brief.	3.4
7/13/2025	motions practice	Daniel Jacobson	Draft response brief.	10.72
7/14/2025	motions practice	Daniel Jacobson	Draft summary judgment response brief.	7.09
7/15/2025	motions practice	Daniel Jacobson	Revise response brief.	2.97
7/16/2025	motions practice	Daniel Jacobson	Revise response brief; review DOJ response brief.	5.88
7/31/2025	court hearings	Daniel Jacobson	Prepare for argument.	3.68
8/1/2025	court hearings	Daniel Jacobson	Participate in moot; prepare for oral argument.	4.39
8/2/2025	court hearings	Daniel Jacobson	Prepare for oral argument.	3.24
8/3/2025	court hearings	Daniel Jacobson	Prepare for argument.	7.51
8/4/2025	court hearings	Daniel Jacobson	Prepare for and participate in hearing; draft proposed order post-hearing.	7.32
8/6/2025	motions practice	Daniel Jacobson	Review government response on proposed order.	0.17
8/13/2025	motions practice	Daniel Jacobson	Review government filing.	0.18
8/14/2025	motions practice	Daniel Jacobson	Draft response to status report;	1.27

8/14/2025	motions practice	Daniel Jacobson	attend call with clients on response to status report	0.43
8/15/2025	Case development	Daniel Jacobson	Review opinion.	0.5
8/19/2025	Case development	Daniel Jacobson	Review government proposed filing; confer internally and with clients.	1.15
8/20/2025	Case development	Daniel Jacobson	Participate in call with DOJ on joint status report; review draft filing.	0.6
8/21/2025	Case development	Daniel Jacobson	Review ED appropriations.	0.4
8/24/2025	Case development	Daniel Jacobson	Communicate with DOJ on next status report.	0.5
8/27/2025	Case development	Daniel Jacobson	review status report.	0.41
8/27/2025	Case development	Daniel Jacobson	Attend call with opposing counsel re status report	0.7
8/28/2025	Case development	Daniel Jacobson	Attend JLG call to discuss FY24 funds.	0.64
9/3/2025	Case development	Daniel Jacobson	Confer via email with AUSA regarding next status report.	0.42
9/4/2025	Case development	Daniel Jacobson	Review draft status report.	0.14
9/18/2025	Case development	Daniel Jacobson	Review status report.	0.04
9/25/2025	Case development	Daniel Jacobson	Review draft status report and confer with opposing counsel.	0.57

10/6/2025	fee petition preparation	Daniel Jacobson	Research case law and D. Md. rules on recovering fees.	0.77
10/7/2025	fee petition preparation	Daniel Jacobson	Attend calls on fees issues; research fees issues.	0.61
10/16/2025	fee petition preparation	Daniel Jacobson	Attend call with K. Snow and L. Eisenberg to discuss fees.	0.41
10/27/2025	fee petition preparation	Daniel Jacobson	Confer with K. Snow and L. Eisenberg regarding fee requests.	0.26
11/2/2025	fee petition preparation	Daniel Jacobson	Revise fee declaration.	1.15
11/8/2025	fee petition preparation	Daniel Jacobson	Revise brief on motion or fees.	0.92
Total				206.67

Date	Litigation Phase	Lawyer	Description	Hours
3/27/2025	Pleadings	Lynn Eisenberg	Outline draft complaint.	2.75
3/29/2025	Pleadings	Lynn Eisenberg	Draft REL section of complaint.	0.44
3/30/2025	Pleadings	Lynn Eisenberg	Draft factual background of complaint.	1.32

3/31/2025	Pleadings	Lynn Eisenberg	Draft factual background of complaint; meet with Child Trends to discuss documents and harm; meet with RMC to discuss documents and harm.	5.87
4/1/2025	Pleadings	Lynn Eisenberg	Draft injury section of complaint; edit complaint; draft preservation notice	3.37
4/2/2025	Pleadings + motions practice	Lynn Eisenberg	Draft and edit complaint; edit draft declarations to accompany preliminary injunction	5.22
4/3/2025	Pleadings + motions practice	Lynn Eisenberg	Edit draft complaint; draft preliminary injunction motion; edit related declarations; research related to preliminary injunction standard in the First Circuit	6.05
4/4/2025	Pleadings + motions practice	Lynn Eisenberg	Edit draft complaint; edit draft declarations; draft preliminary injunction	4.92

4/5/2025	Pleadings + Case development	Lynn Eisenberg	Edit draft complaint; evaluate claims in light of 4/4 Supreme Court order	1.72
4/6/2025	Pleadings + motions practice	Lynn Eisenberg	Edit draft RMC declaration; make conforming edits to Complaint; meeting with clients re SCOTUS ruling	2.14
4/7/2025	Pleadings + motions practice	Lynn Eisenberg	Finalize draft complaint and file complaint and related materials; edit draft declarations	5.12
4/8/2025	Pleadings + motions practice	Lynn Eisenberg	research fourth circuit caselaw and draft irreparable harm and background sections of PI motion	3.45
4/9/2025	Motions practice	Lynn Eisenberg	Draft preliminary injunction motion and related declarations	4.2
4/10/2025	Motions practice	Lynn Eisenberg	Edit draft PI declarations; strategize PI timing and response; file disclosures and proof of service; edit draft PI and order	4.62

4/11/2025	Motions practice	Lynn Eisenberg	Edit draft PI motion; briefs and declarations; file joint motion for PI briefing schedule	4.25
4/13/2025	Motions practice	Lynn Eisenberg	Edit draft RMC declaration; edit PI brief; meet with potential anonymous declarant and draft declaration	1.85
4/14/2025	Motions practice	Lynn Eisenberg	Finalize declarations; add declaration citations to PI brief; edit draft PI brief	5.09
4/15/2025	Motions practice	Lynn Eisenberg	Finalize declarations and related citations; finalize documents and file PI and exhibits	5.14
4/18/2025	Motions practice	Lynn Eisenberg	Review related filing	0.57
4/23/2025	Motions practice	Lynn Eisenberg	Review Defendants' Response to Motion for PI; Call with D. Jacobson and K. Snow re strategy for reply brief; draft reply brief	2
4/24/2025	Motions practice	Lynn Eisenberg	meeting with JLG and clients re reply brief	0.49

4/24/2025	Motions practice	Lynn Eisenberg	Research for PI reply brief; draft same	3.15
4/25/2025	Motions practice	Lynn Eisenberg	Draft PI reply brief	2.67
4/26/2025	Motions practice	Lynn Eisenberg	Edit draft PI reply brief	1.7
4/27/2025	Motions practice	Lynn Eisenberg	Finalize and file PI reply brief	0.65
5/7/2025	Motions practice	Lynn Eisenberg	Review order for additional briefing	0.15
5/8/2025	Motions practice	Lynn Eisenberg	Review draft letter response to Court's stay order and correspondence with client re same	0.35
5/11/2025	Motions practice	Lynn Eisenberg	Review edits to draft response to stay	0.27
5/12/2025	Motions practice	Lynn Eisenberg	Review and edit letter response; review Government's response re same	0.44
5/18/2025	court hearings	Lynn Eisenberg	Draft questions for Moot; Review materials	0.5
5/19/2025	court hearings	Lynn Eisenberg	Attend moot in preparation for hearing; edit hearing demonstratives and related research	2.24
5/20/2025	court hearings	Lynn Eisenberg	Prepare for PI hearing	2.5

6/2/2025	Motions practice	Lynn Eisenberg	Review notice of supplemental authority; confer with D. Jacobson and K. Snow re same	0.54
6/4/2025	motions practice	Lynn Eisenberg	Edit and file response to notice of supplemental authority	0.54
6/6/2025	motions practice	Lynn Eisenberg	Edit response to notice of supplemental authority	0.15
6/7/2025	motions practice	Lynn Eisenberg	Review draft response to notice of supplemental authority	0.6
6/12/2025	case development	Lynn Eisenberg	Confer with clients re next steps after PI order	0.82
6/20/2025	motions practice	Lynn Eisenberg	Draft motion for summary judgment	2.9
6/20/2025	motions practice	Lynn Eisenberg	Edit draft brief in support of summary judgment	1.4
6/24/2025	motions practice	Lynn Eisenberg	Review administrative record; correspondence with the client re same	0.64
6/25/2025	motions practice	Lynn Eisenberg	Draft motion for summary judgment	1.29
6/26/2025	motions practice	Lynn Eisenberg	Draft motion for summary judgment	0.84

6/30/2025	Motions practice + case development	Lynn Eisenberg	Confer with Ms. Snow re summary judgment motion and declarations; confer with clients re potential amended complaint	0.85
7/1/2025	motions practice	Lynn Eisenberg	Edit draft motion for summary judgment	0.34
7/3/2025	motions practice	Lynn Eisenberg	Edit draft motion for summary judgment	1.44
7/5/2025	motions practice	Lynn Eisenberg	Edit draft motion for summary judgment	0.54
7/7/2025	motions practice	Lynn Eisenberg	Edit draft motion for summary judgment	1.39
7/8/2025	motions practice	Lynn Eisenberg	Edit draft motion for summary judgment	0.39
7/9/2025	motions practice	Lynn Eisenberg	Edit and finalize summary judgment brief; review defendants' summary judgment filing	3.37
7/10/2025	motions practice	Lynn Eisenberg	confer with D. Jacobson and K. Snow re summary judgment response	0.64
7/10/2025	motions practice	Lynn Eisenberg	Review defendants' motion for summary judgment	0.15

7/11/2025	motions practice	Lynn Eisenberg	Draft reply to motion for summary judgment MTD and motion to transfer	2.31
7/12/2025	motions practice	Lynn Eisenberg	Draft response to motion for summary judgment and transfer	0.78
7/13/2025	motions practice	Lynn Eisenberg	Draft and edit response to Defendants' motion for summary judgment	0.81
7/14/2025	motions practice	Lynn Eisenberg	Edit response to motion for summary judgment	0.24
7/14/2025	motions practice	Lynn Eisenberg	confer with clients re summary judgment response	0.76
7/16/2025	motions practice	Lynn Eisenberg	Edit draft response motion for summary judgment; review government's response	0.47
7/30/2025	court hearings	Lynn Eisenberg	Prepare for moot	0.14
7/31/2025	court hearings	Lynn Eisenberg	Prepare for summary judgment hearing moot	0.5
8/1/2025	court hearings	Lynn Eisenberg	Moot Mr. Jacobson for hearing; confer with clients re same	1.88

8/4/2025	court hearings	Lynn Eisenberg	prepare for hearing on motions for summary judgment; draft and edit proposed order	2.8
8/6/2025	motions practice	Lynn Eisenberg	Review defendants' edits to proposed order; confer with K. Snow re same; edit draft notice re same	0.36
8/13/2025	motions practice	Lynn Eisenberg	Review status report	0.17
8/14/2025	motions practice	Lynn Eisenberg	edit draft response to Defendants' filing	0.39
8/14/2025	motions practice	Lynn Eisenberg	Confer with clients re Defendants' filing	0.43
8/15/2025	Case development	Lynn Eisenberg	Review Order	0.7
8/19/2025	Case development	Lynn Eisenberg	Review draft joint status report; confer with clients and counsel re same	1.15
8/19/2025	Case development	Lynn Eisenberg	confer with AUSA re joint status report	0.35
8/20/2025	Case development	Lynn Eisenberg	Finalize joint status report; confer with Ms. Snow and Mr. Jacobson re same; confer with DOJ re same	1.87

8/21/2025	Case development	Lynn Eisenberg	Review and analyze reinstatement notifications; confer with clients re same	1.02
8/24/2025	Case development	Lynn Eisenberg	Research re Tydings	0.1
8/26/2025	Case development	Lynn Eisenberg	Correspondence with AUSA re status report	0.15
8/27/2025	Case development	Lynn Eisenberg	Review and edit draft second joint status report	2.6
8/28/2025	Case development	Lynn Eisenberg	Confer with Mr. Jacobson and Ms. Snow re September 4 status report and use of funds beginning October 1 2026	0.75
8/29/2025	Case development	Lynn Eisenberg	Review message sent to comprehensive centers; confer with client re same	1.2
9/2/2025	Case development	Lynn Eisenberg	Review email correspondence re REL outreach; correspondence with clients re carryover funds	0.11

9/3/2025	Case development	Lynn Eisenberg	Review documents sent from ED to plaintiffs re reinstatement of grants and contracts; email correspondence with AUSA re next joint status report	0.65
9/4/2025	Case development	Lynn Eisenberg	Correspondence with AUSA re joint status report; edit joint status report; review CC grant notification	0.75
9/5/2025	Case development	Lynn Eisenberg	Review updated draft cooperative agreements for CCs; compare to prior versions	0.9
9/6/2025	Case development	Lynn Eisenberg	Draft summary of concerns with CC agreements sent to RMC and CT	0.39
9/8/2025	Case development	Lynn Eisenberg	Review FAQ re RELs	0.21
9/9/2025	Case development	Lynn Eisenberg	Confer with CT re cooperative agreement; review questions and FAQ relating to REL plan submission	0.94
9/10/2025	Case development	Lynn Eisenberg	Confer with RMC re cooperative agreement	0.65
9/11/2025	Case development	Lynn Eisenberg	Edit draft status report	0.1

9/16/2025	Case development	Lynn Eisenberg	Correspondence re REL obligations	0.36
9/18/2025	Case development	Lynn Eisenberg	Edit joint status report; email correspondence with clients and AUSA re same	0.46
9/23/2025	Case development	Lynn Eisenberg	Correspondence with clients re case and potential shutdown	0.1
9/25/2025	Case development	Lynn Eisenberg	Review draft status report; email correspondence with clients re same	0.32
9/26/2025	Case development	Lynn Eisenberg	Review CC GANS	0.19
9/29/2025	Case development	Lynn Eisenberg	Finalize status report; email correspondence with clients and AUSA re same	0.47
10/6/2025	fee petition preparation	Lynn Eisenberg	Review research relating to attorneys fees	0.18
10/7/2025	fee petition preparation	Lynn Eisenberg	Review research re attorneys fees; meet with D. Jacobson re same	0.78
10/14/2025	fee petition preparation	Lynn Eisenberg	Review billing spreadsheet in light of local rules re attorney fees	0.28
10/16/2025	fee petition preparation	Lynn Eisenberg	Confer with D. Jacobson and K. Snow re attorney fees	0.41

10/19/2025	fee petition preparation	Lynn Eisenberg	Review legal analysis re fees	0.39
10/27/2025	fee petition preparation	Lynn Eisenberg	Review caselaw on attorney's fees; confer with D. Jacobson and K. Snow re same	0.75
10/31/2025	fee petition preparation	Lynn Eisenberg	Review and edit draft attorney declaration re fees; edit fee chart	1.21
11/2/2025	fee petition preparation	Lynn Eisenberg	Edit attorney declaration	0.1
Total				136.66

Date	Litigation Phase	Lawyer	Description	Hours
4/1/2025	Pleadings + motions practice	Kyla Snow	Draft complaint; draft declarations to accompany preliminary injunction motion; research and begin outlining PI brief	5.55
4/2/2025	Pleadings + motions practice	Kyla Snow	Draft complaint and declarations to accompany preliminary injunction motion	3.17

4/3/2025	Pleadings + motions practice	Kyla Snow	Draft and edit complaint and declarations for PI motion; research and draft PI motion	3
4/4/2025	Pleadings + motions practice	Kyla Snow	Review and edit complaint; background reading and research for PI brief; draft PI brief	5.15
4/5/2025	Pleadings + Motions practice	Kyla Snow	Draft PI background; edit complaint; evaluate claims in light of Supreme Court California v. Department of Education opinion	3
4/6/2025	Pleadings + motions practice	Kyla Snow	Review and edit complaint; edit citations in complaint; draft PI background section	1.75
4/11/2025	Motions practice	Kyla Snow	Edit PI brief	1
4/14/2025	Motions practice	Kyla Snow	prepare declaration for exhibits, review and edit PI	2.5
4/15/2025	Motions practice	Kyla Snow	Edit PI brief and declarations and proposed order	3

4/23/2025	Motions practice	Kyla Snow	Read gov't response brief; research and outline reply brief; case strategy call with D. Jacobson and L. Eisenberg	4.89
4/24/2025	Motions practice	Kyla Snow	call with JLG and clients about reply brief	0.49
4/24/2025	Motions practice	Kyla Snow	Research and draft reply brief call with client	5.55
4/25/2025	Motions practice	Kyla Snow	research and draft reply brief	2.92
4/26/2025	Motions practice	Kyla Snow	edit PI reply	0.62
4/27/2025	Motions practice	Kyla Snow	edit PI reply brief	1.95
5/7/2025	Motions practice	Kyla Snow	read letter order on potential stay and discuss with D. Jacobson, start drafting response	0.82
5/8/2025	Motions practice	Kyla Snow	draft response to letter order	6
5/12/2025	Motions practice	Kyla Snow	review and input CT edits; file response	1
5/15/2025	Motions practice	Kyla Snow	finish editing and file response to notice of related case	0.6
5/17/2025	Case development	Kyla Snow	moot prep: create cheat sheet; review briefs and arguments	2

5/18/2025	court hearings	Kyla Snow	moot prep: finish cheat sheet; reread briefs and prep questions	1
5/19/2025	court hearings	Kyla Snow	prepare for and attend moot; prep materials for oral argument	2.45
5/20/2025	court hearings	Kyla Snow	prepare for PI hearing	2.5
5/21/2025	Motions practice	Kyla Snow	draft and file new proposed order. Call with clients to discuss proposed order	2.09
6/2/2025	Motions practice	Kyla Snow	Read government notice; call with D. Jacobson and L. Eisenberg related to notice; draft response to gov't notice	3.85
6/3/2025	motions practice	Kyla Snow	Draft response to government notice	1.35
6/4/2025	motions practice	Kyla Snow	Edit response to government notice	0.22
6/6/2025	motions practice	Kyla Snow	Research law on unpublished circuit opinions; review and edit response to gov't notice	0.5

6/11/2025	case development	Kyla Snow	Read district court opinion; research timelines for issuing NOFOs and grants in 2024	0.84
6/30/2025	Motions practice	Kyla Snow	Review PI briefing and begin editing summary judgment brief	4.38
6/30/2025	Motions practice	Kyla Snow	call with L. Eisenberg to discuss next steps for brief and declarations	0.38
6/30/2025	Motions practice	Kyla Snow	review and edit declarations	0.22
7/1/2025	motions practice	Kyla Snow	Draft and edit summary judgment brief	6.15
7/1/2025	motions practice	Kyla Snow	review and edit declarations and email to clients re updates to declarations	0.9
7/2/2025	motions practice	Kyla Snow	draft proposed order	0.38
7/2/2025	motions practice	Kyla Snow	draft SJ brief	6.43
7/2/2025	motions practice	Kyla Snow	update declarations	0.1
7/3/2025	motions practice	Kyla Snow	draft and edit summary judgment brief	3.76
7/3/2025	motions practice	Kyla Snow	Review and input edits to declarations, follow up with clients on declarations	1.16

7/5/2025	motions practice	Kyla Snow	Revise summary judgment brief	2.27
7/6/2025	motions practice	Kyla Snow	Revise summary judgment brief	5.55
7/7/2025	motions practice	Kyla Snow	Edit brief; check all citations; create motion page	3.95
7/7/2025	motions practice	Kyla Snow	edit declarations and incorporate into brief	0.7
7/8/2025	motions practice	Kyla Snow	Revise declarations and summary judgment brief	1.02
7/9/2025	motions practice	Kyla Snow	Edit summary judgment brief; file and email to clients	4.52
7/10/2025	motions practice	Kyla Snow	Call with D. Jacobson and L. Eisenberg to discuss summary judgment response	0.64
7/10/2025	motions practice	Kyla Snow	Review and analyze government brief, research transfer/stays	1.8
7/11/2025	motions practice	Kyla Snow	Research transfer/stay and draft response/reply brief	5.5
7/12/2025	motions practice	Kyla Snow	Edit response brief and research leg. history of transfer/stay statute	0.67

7/13/2025	motions practice	Kyla Snow	Research 706(1) & 706(2) legal standards and draft response brief	2.84
7/14/2025	motions practice	Kyla Snow	Call with clients to discuss arguments and next steps	0.76
7/14/2025	motions practice	Kyla Snow	research legal issues and draft response brief	3.35
7/15/2025	motions practice	Kyla Snow	Edit response brief; check cites	1.34
7/16/2025	motions practice	Kyla Snow	Edit response brief; check cites; file brief; review gov't brief	3.4
7/28/2025	motions practice	Kyla Snow	Prepare and file response to notice re cases raising similar issues	0.24
8/1/2025	court hearings	Kyla Snow	Prepare for and attend moot	1.87
8/4/2025	court hearings	Kyla Snow	prepare for hearing on motions for summary judgment	2
8/4/2025	motions practice	Kyla Snow	Proposed order - draft, edit, and file	1.72
8/6/2025	motions practice	Kyla Snow	Review government filing; confer with L. Eisenberg; draft and file response	0.82
8/14/2025	motions practice	Kyla Snow	Client call re Defendants' status report	0.43

8/14/2025	motions practice	Kyla Snow	review gov't status report and draft response	1.86
8/15/2025	Case development	Kyla Snow	Review opinion	0.7
8/19/2025	Case development	Kyla Snow	Review gov't draft and discuss with D. Jacobson and L. Eisenberg and clients	0.98
8/19/2025	Case development	Kyla Snow	call with DOJ	0.35
8/20/2025	Case development	Kyla Snow	Review and edit draft status report discuss edits with Dan and Lynn call with clients and call with DOJ	1.25
8/27/2025	Case development	Kyla Snow	Call with opposing counsel	0.7
8/27/2025	Case development	Kyla Snow	review, edit and file status report	0.55
8/28/2025	Case development	Kyla Snow	Call with D. Jacobson and L. Eisenberg on questions from clients related to restoration of grants	0.4
8/29/2025	Case development	Kyla Snow	Client call about message sent to comprehensive centers	0.93
9/18/2025	Case development	Kyla Snow	Review and file status report	0.12

9/30/2025	fee petition preparation	Kyla Snow	Attorney's fees research and discussions	0.74
10/6/2025	fee petition preparation	Kyla Snow	Research EAJA caselaw in D. Md. and procedural rules for filing EAJA motions; discuss next steps with Dan and Lynn	2.19
10/7/2025	fee petition preparation	Kyla Snow	EAJA research	0.14
10/14/2025	fee petition preparation	Kyla Snow	EAJA -- collect and organize billing information (1 hr, 20 min). research EAJA elements and CA4 caselaw (4 hrs, 20 min). draft motion (1 hr, 40 min). Draft offer letter (40 min)	8
10/15/2025	fee petition preparation	Kyla Snow	Organize billing records (.4); research EAJA elements (.2); research motions and bill of costs procedures (.1)	0.7
10/16/2025	fee petition preparation	Kyla Snow	Call with L. Eisenberg and D. Jacobson to discuss fee request (0.36), organize billing records (1.15), research EAJA elements in CA4 (1.27), draft motion (4)	6.78
10/17/2025	fee petition preparation	Kyla Snow	Draft EAJA motion	3.85

10/19/2025	fee petition preparation	Kyla Snow	Draft EAJA motion	1.55
10/25/2025	fee petition preparation	Kyla Snow	Edit EAJA memo (1.07), review sample declarations and supporting materials and draft client declarations (1.22)	2.29
10/27/2025	fee petition preparation	Kyla Snow	Call with D. Jacobson and L. Eisenberg to discuss EAJA memo (.24); edit client declarations and bill of costs and email materials to clients (.31)	0.55
10/28/2025	fee petition preparation	Kyla Snow	File bill of costs	0.1
10/29/2025	fee petition preparation	Kyla Snow	Edit EAJA brief (.25), review, edit and finalize RMC declaration (.18)	0.43
10/30/2025	fee petition preparation	Kyla Snow	Draft attorney declaration (2.63), edit brief (1.29)	3.92
10/31/2025	fee petition preparation	Kyla Snow	Answer client questions about declarations and finalize CT declaration (.14), edit billing records (.37), edit attorney declaration (.36)	0.87

11/3/2025	fee petition preparation	Kyla Snow	Review and incorporate attorney declaration edits	0.1
11/6/2025	fee petition preparation	Kyla Snow	Edit EAJA brief (.83)	0.83
11/10/25	fee petition preparation	Kyla Snow	Update billing records and EAJA motion	.27
11/10/25	fee petition preparation	Kyla Snow	Finalize exhibits and other documents accompanying motion (.39), update Dwyer declaration (.25)	.64
Hours				180.8